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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

Case No. 17-cv-02972(JS)(AKT)

NELSON CASTILLO, MARTA VALLADARES,
ARACELY VALLADARES, CARLOS REYES, and
YOSELY ESPINAL HENRIQUEZ, individually and on
behalf of all others similarly situated,

Plaintiffs,

- against -

PERFUME WORLDWIDE INC. and PIYUSH GOLIA,

Defendants.

**NOTICE OF PLAINTIFFS'
MOTION FOR CONDITIONAL
COLLECTIVE CERTIFICATION
AND FOR COURT
FACILITATION OF NOTICE
PURSUANT TO 29 U.S.C. § 216(b)**

Please take notice that upon the accompanying Memorandum of Law and annexed materials, the Plaintiffs Nelson Castillo, Marta Valladares, Aracely Valladares, Carlos Reyes, and Yosely Espinal Henriquez, on behalf of themselves and all others similarly situated, by Moser Employment Law Firm, P.C., the undersigned attorney, shall move the Court before the Honorable A. Kathleen Tomlinson, United States Magistrate Judge, at the United States Courthouse for the Eastern District of New York, 100 Federal Plaza, Central Islip, New York, 11722 on such day and time as counsel may be heard, for the following relief in this Fair Labor Standards Act collective action:

(1) Conditional certification of this action as a representative collective action pursuant to the FLSA , 29 U.S.C. § 216, on behalf of all current and former hourly employees of Perfume Worldwide, Inc. who have been employed at any

time from May 16, 2014 until the Court's decision on this motion (the "Covered Employees");

(2) Production of the Covered Employees in a computer readable data file containing their names, last known mailing addresses, telephone numbers and dates of employment within ten (10) business days of this Court's order (the "Opt-In List");

(3) Approval of the proposed FLSA notice of this action and the consent form annexed to the Notice of Motion as Exhibit 1, and permission to provide notice by regular mail to the Covered Employees in English and Spanish;

(4) Directing Plaintiffs' counsel to mail said notice to each opt-in class member within ten (10) business days of receipt of the Opt-In List;

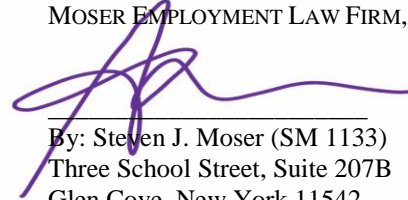
(5) Setting a period of Ninety (90) days following the date on which the Notice is mailed for Covered Employees to mail completed consent forms to Plaintiffs' Counsel (the "Opt-In Period");

(6) Directing the defendants to post multiple copies of the Notice, along with the consent forms, immediately adjacent to each punch clock/biometric time clock used by Covered Employees who are presently employed for the entire duration of the opt-in period; and

(7) Directing the Defendants to file an affidavit of compliance with the posting requirements within ten (10) days of the close of the opt-in period.

Dated: August 5, 2017
Glen Cove, New York

Respectfully Submitted,
MOSER EMPLOYMENT LAW FIRM, P.C.



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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

MARTA VALLADARES, ARACELY VALLADARES,
CARLOS REYES, and YOSELY ESPINAL
HENRIQUEZ, individually and on behalf of all others
similarly situated,

Plaintiffs,

Case No.: 17-cv-2972(JS)(AKT)

CERTIFICATE OF SERVICE

- *against* -

PERFUME WORLDWIDE INC.,

Defendant.

The undersigned counsel hereby certifies that on August 5, 2017 he caused a true and correct copy of the Plaintiff's Motion for Conditional Collective Certification and for Court Facilitation of Notice Pursuant to 29 U.S.C. § 216(b), supporting memorandum of law and exhibits in support thereof to be served by CM/ECF upon the counsel of record listed below:

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212.239-9669 tel
212.239-9688 fax

Dated: Glen Cove, New York
August 5, 2017

/S/

Steven J. Moser (SM 1133)